### UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

IN RE: COLGATE-PALMOLIVE	)	
SOFTSOAP ANTIBACTERIAL HAND	)	MDL Docket No. 12-md-2320-PB
SOAP MARKETING AND SALES	)	
PRACTICES LITIGATION	)	All Actions
(MDL NO. 2320)	)	
	)	

## ASSENTED-TO MOTION OF CLASS COUNSEL FOR ATTORNEYS FEES AND COSTS

Pursuant to Federal Rule of Civil Procedure 23 and Local Rule 23.1 and this Court's Preliminary Approval Order dated June 5, 2015 (Dkt. 93) (the "Preliminary Approval Order"), plaintiffs Tracy Nieblas, Shari Elstein, Kristina Pearson, Adam Emery and Jeff Dyke, in their individual capacities and as class representatives ("Plaintiffs"), by and through Class Counsel, respectfully move this Court for entry of an Order awarding Attorneys' Fees and Expenses, including Notice Administrator fees and Representative Plaintiffs' Incentive Payments, in the aggregate amount of \$2,000,000, for the reasons set forth in the Plaintiffs' supporting Memorandum, attached hereto.

Of this aggregate amount, Class Counsel respectfully request that the Court grant their request for Representative Plaintiffs incentive payments of \$2,500 per class representative, for a total aggregate incentive payment amount of \$12,500.00, Notice Administrator fees in the amount of \$174,496, and Class Counsel attorneys' fees and expenses in the amount of \$1,813,004, payable by Defendant Colgate-Palmolive Company. Defendant assents to the filing of this motion and the relief requested herein.

Dated: August 3, 2015

Respectfully submitted,

### /s/ Lucy J. Karl

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### **CERTIFICATE OF SERVICE**

The undersigned certifies that on August 3, 2015, she caused this document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of filing to counsel of record for each party.

Undersigned counsel further certifies that she caused this document to be served via First Class Mail, Postage Prepaid to the following:

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/s/ Lucy J. Karl Lucy J. Karl Dated: August 3, 2015 By:

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